

FILED  
AUG 17 1994

HOWARD HANSON  
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5 Attorney for Defendant and Cross-Complainant  
GERALD ARMSTRONG  
6

7  
8 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF MARIN  
9

RECEIVED  
AUG 18 1994

10 CHURCH OF SCIENTOLOGY INTERNATIONAL, )  
11 a California not-for-profit )  
religious corporation, )  
12 )  
Plaintiff, )  
13 )  
vs. )  
14 )  
GERALD ARMSTRONG; MICHAEL WALTON; )  
15 THE GERALD ARMSTRONG CORPORATION, )  
a California for-profit )  
16 corporation; DOES 1 through 100, )  
inclusive, )  
17 )  
Defendants. )  
18 )  
19

No. 157 680 HUB LAW OFFICES

NOTICE OF MOTION AND  
MOTION TO COMPEL FURTHER  
INTERROGATORIES AND FOR  
SANCTIONS; POINTS AND  
AUTHORITIES; DECLARATION  
OF FORD GREENE; SEPARATE  
STATEMENT OF FORM  
INTERROGATORIES AND  
RESPONSES IN DISPUTE

Date: 9/2/94  
Time: 10:00 a.m.  
Dept: Referee Benz  
Trial Date: 9/29/94

20 TO PLAINTIFF AND CROSS-DEFENDANT CHURCH OF SCIENTOLOGY  
INTERNATIONAL AND TO ITS ATTORNEYS OF RECORD:

21 PLEASE TAKE NOTICE that on September 2, 1994, at 10:00 a.m.,  
22 or as soon thereafter as the matter may be heard by the discovery  
23 referee, William R. Benz located at 900 Larkspur Landing Circle,  
24 No. 185, Larkspur, California, Defendant and Cross-Complainant  
25 Gerald Armstrong will seek an Order requiring Scientology to  
26 further respond to the Form Interrogatories that are set forth  
27 more fully in the Statement of Requests and Disputed Responses.  
28 In addition Armstrong seeks an order which awards monetary



1 sanctions against plaintiff and its attorneys, the law firms of  
2 Bowles and Moxon, and Wilson, Ryan and Campolongo and against  
3 Laurie J. Bartilson and Andrew Wilson.

4 This motion is brought pursuant to Code of Civil procedure  
5 sections 2023, 2030 and 2033.5 and is factually predicated on  
6 plaintiff's failure to properly respond to certain Form  
7 Interrogatories and Requests for Admission propounded by  
8 Armstrong.

9 This motion is based upon the instant Notice, the  
10 accompanying Memorandum of Points and Authorities, Statement of  
11 Requests and Responses in Dispute, the Declaration of Ford Greene,  
12 all such corresponding documents filed in support of Armstrong's  
13 motion to compel further responses to his First Set of Requests  
14 for Admission, and all the Court's files and records in this case.

15 DATED: August 17, 1994

HUB LAW OFFICES

16  
17  
18 By: 

FORD GREENE  
Attorney for Defendant and  
Cross-Complainant  
GERALD ARMSTRONG



PROOF OF SERVICE

I am employed in the County of Marin, State of California. I am over the age of eighteen years and am not a party to the above entitled action. My business address is 711 Sir Francis Drake Boulevard, San Anselmo, California. I served the following

documents: NOTICE OF MOTION AND MOTION TO COMPEL FURTHER RESPONSES TO FORM INTERROGATORIES AND FOR SANCTIONS; SEPARATE STATEMENT OF FORM INTERROGATORIES AND RESPONSES IN DISPUTE; DECLARATION OF FORD GREENE IN SUPPORT OF MOTION TO COMPEL FURTHER RESPONSES TO FORM INTERROGATORIES AND FOR MONETARY SANCTIONS; MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF MOTION TO COMPEL FURTHER RESPONSES TO FORM INTERROGATORIES FROM PLAINTIFF

on the following person(s) on the ~~date set forth~~<sup>8-18-94</sup> below, by placing a true copy thereof enclosed in a sealed envelope with postage thereon fully prepaid to be placed in the United States Mail at San Anselmo, California:

MICHAEL WALTON, ESQ.  
P.O. Box 751  
San Anselmo, CA 94979

Andrew Wilson, Esquire  
WILSON, RYAN & CAMPILONGO  
235 Montgomery Street, Suite 450  
San Francisco, California 94104

LAURIE J. BARTILSON, ESQ.  
Bowles & Moxon  
6255 Sunset Boulevard, Suite 2000  
Los Angeles, California 90028

(Personal Service) I caused such envelope to be delivered by hand to the offices of the addressee.

(State) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

DATED: ~~May 31, 1994~~<sup>8-17-94</sup>

